



National Association of Charterboat Operators

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September 11, 2014

NOAA Fisheries

1315 East-West Highway

Silver Spring, MD 20910

RE: Input on National Saltwater Recreational Fisheries Policy

The National Association of Charterboat Operators (NACO) is an association representing charter boat owners and operators across the United States from Alaska to Maine, including the Great Lakes, Hawaii, and the U.S. Island Territories. Our members own and operate small passenger vessels that are used for fishing, diving, sailing, eco tours, and many other venues providing access to families and individuals to our natural marine resources.

We appreciate the opportunity to comment on the proposed National Saltwater Recreational Fisheries Policy. As stated above, our members provide "access" to recreational anglers to enjoy our natural marine resources. As all know, without access there can be no opportunity. Therefore, we strongly suggest that any National Policy begin by recognizing that saltwater recreational fisheries must have access in order to provide opportunities for recreational anglers.

We recognize that if a fishery is designated as overfished and undergoing over fishing, closures may be necessary for a limited amount of time, especially in severely overfished conditions. However, every effort must be made to find a way to allow access in order to provide recreational opportunities. Closures are the number one killer for access and opportunity and should be avoided as much as possible.

The recreational sector includes private recreational anglers and the various charter for hire vessel owners that include charter boats, headboats, guide boats, and dive boats. The recreational charter for hire vessel owners simply provide a platform providing the opportunity for anglers to fish recreationally. Therefore, there is only one recreational sector, and all should be managed under the same regulations. Federally permitted for hire vessels should not be restricted from fishing in their home state waters when the EEZ is closed at the same time state waters are open. This not only discriminates against recreational anglers who select different angling opportunities, but also harms small family businesses and fishing communities.

The Policy should specify that catch share programs should not be used to manage any recreational fishery. Catch shares are intended to reduce fleet capacity and fishing opportunities while doing nothing to enhance the resource. Catch share programs are contrary to how recreational anglers view their needs and desires. Intersector trading of fish species between commercial and recreational fisheries should be strongly rejected and every effort should be made to prevent such trading. The Policy should include language opposing any intersector trading.

In some regions of the country, sustenance fishing is an important component of fisheries. While this activity is considered by some to be neither recreational nor commercial, it is a very important activity and should be recognized as such. Any National Policy should provide for and encourage sustenance fishing in areas where this has been a historical practice.

Typically allocations of fisheries between recreational and commercial users have been based on historical landings, many times based on flawed recreational harvest data. National Standard 8 of the Magnuson Stevens Act provides that fishery management take into account the importance of fishery resources to fishing communities by considering the social and economic impacts of regulations on those fisheries. We recommend that social and economic data be given more weight in determining the future allocations of fisheries between recreational and commercial users. We also recommend periodic review of allocations between the recreational and commercial fisheries at a minimum of every 5 years.

The National Policy should encourage and support new and innovative management measures to better manage saltwater recreational fisheries. Recreational fisheries cannot be properly managed the same as commercial fisheries. Quotas create targets that when reached in rebuilding fisheries create shorter fishing seasons and closures. Multiyear and other management schemes utilizing mortality based management systems should be considered in order to establish stability in recreational fisheries, thus providing access and opportunity. Supporting measures to manage by a fixed bag limit of several species and keeping a certain number based on science will help to reduce release mortality. Anglers are capable of selecting the number and size of the various species they desire. The Policy should be flexible enough to allow for and encourage local and regional input in how their fisheries are managed. The National Policy should actively promote such innovation in management.

Habitat enhancement by utilizing artificial reefs and other measures should be promoted, encouraged, and supported by the Policy. The use of artificial reefs is critical to the continued enhancement of our marine resources, as has been proven in the many areas where artificial reefs are created. As management continues to attempt to rebuild stocks to levels of biomass never before seen, more habitat will be necessary to maintain such biomass. In addition, where habitat has been degraded for various reasons, natural and manmade, replacement by artificial reefs and other measures will help to improve the resource.

A regional recreational coordinator, who will have more than a public relations position, will serve to provide more confidence to the recreational sector that the Policy will be more than a feel good measure. The National Policy should be incorporated into each regions strategic plan. The Policy should encourage equal membership of recreational representatives on each regional management council. In addition, more cooperation between the NMFS and the State marine resource agencies should be a priority of the Policy. Fair and equal access to both state waters and the EEZ by all recreational anglers regardless of how, where, and who they fish with should be strongly encouraged and actively supported by the Policy.

The term "Catch Shares" has multiple definitions. In the traditional sense catch shares are a management process where a fishery quota is allocated in portions to individual fishermen. NACO has an established policy opposed to catch shares and sector separation in the recreational fishery. There is a proposed management process where commercial quota may be purchased by a nonprofit and that quota will then be placed in the recreational allocation so that the bag limit can be sustained. This allocation will be equally shared by the recreational anglers so no one individual will have more bag limit than another. This is a new type of catch share which will need to be discussed. As such we suggest the Policy should specify that catch share programs, in the traditional sense where they lead to IFQs should not be used to manage any recreational fishery. Traditional catch share programs are contrary to how recreational anglers view their needs and desires. Intersector trading of fish species between commercial and recreational fisheries by purchase or lease by IFQs should be strongly rejected and every effort should be made to prevent such trading.

The Policy should promote and encourage cooperative research using recreational anglers. A wealth of information is available from the recreational angling community and every opportunity should be utilized to access this information. Angler confidence that the Policy will help to enhance access and opportunity will be increased by any effort by the NMFS to include the recreational angling community in cooperative research efforts.

Increased social and economic data from the recreational sector is a must. Recreational fishing activities are a multi-billion dollar generator for our economy, and the social benefits of recreational fishing provide untold benefits to the nation. This data is a must and should be considered in every management decision.

The National Policy must provide for serious considerations by the NMFS in their efforts to better manage recreational fisheries. Communication between the recreational community and the NMFS is a must. Trust must be paramount in this communication and actions by the NMFS as they relate to any Policy. Any commitments by the agency as they relate to recreational fisheries must be kept and completed in a timely manner. Communication on any commitments must be provided on a regular basis and the community routinely updated on the progress. Any management actions that may cause extensions to any timeline must be fully and plainly explained so the community is kept fully aware of any issues.

These are our recommendations. We hope that the agency is sincere in their efforts to create a National Policy that will have teeth, be utilized on a National level, and will greatly help to increase efforts to better manage recreational fisheries. These efforts must provide for more recreational angler access thus providing more recreational angling opportunities while sustaining our marine resources.

Sincerely,

Percy Blackburn III

Percy Blackburn III
NACO President

Robert F. Zales II

Robert F. Zales II
Chairman, NACO Fisheries Committee

Cc: NACO Board of Directors